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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ESTHER LOPEZ,

Plaintiff(s),

vs.

LOANCARE; NEW REZ, LLC AND NEW
RESIDENTIAL MORTGAGE, LLC,

Defendant(s).

Case No.: 2:20-cv-00229-JAD-DJA

**JOINT MOTION TO CONTINUE
DISCOVERY DEADLINES**

(First Request)

ESTHER LOPEZ (“Plaintiff”) together with Defendant Loan Care, LLC (“Loan Care”), together the “Parties,” by and through their respective counsel of record, hereby submit this Joint Motion to Continue Discovery (“Motion”), and hereby requests that the discovery deadlines in this case be extended for approximately forty-five (45) days as set forth below. This is the Parties’ first request and is not made for an impermissible purpose. The Parties hereby consent and agree as follows:

1. Plaintiff commenced this action on February 03, 2020. Loan Care filed its Answer on April 21, 2020.

2. On May 07, 2020, the Parties conducted an FRCP Rule 26(f) Conference and subsequently submitted a joint Discovery Plan. On May 14, 2020, the Court entered a Scheduling Order in this case (ECF #16).

1 3. On July 7, 2020, Plaintiff filed a First Amended Complaint, adding two additional parties:
2 New Rez, LLC and New Residential Mortgage, LLC. To date, neither New Rez LLC nor New
3 Residential Mortgage, LLC have appeared.

4 4. The following discovery has been completed:

- 5 a. Plaintiff and Loan Care have participated in a Rule 26(f) conference;
6 b. Plaintiff and Loan Care have exchanged initial disclosure pursuant to Rule 26(a);
7 c. Plaintiff has served written discovery requests, including Interrogatories, Requests
8 for Admissions, and Requests for Documents on Loan Care (“Plaintiff’s Discovery
9 Requests”);
10 d. Loan Care has provided written responses to Plaintiff’s Discovery Request;
11 e. Plaintiff has provided two supplements to her initial disclosures;
12 f. Plaintiff has issued Subpoena Dues Tecum to the following entities: Pahrump
13 Counseling and Nevada State Bank;

14 5. This motion for an extension of the Discovery deadlines is submitted because Plaintiff
15 retained Jay Patterson, a forensic accountant, as an expert witness in this matter and was anticipating
16 having his initial expert report prepared and delivered to Defendants on or before August 19, 2020.
17 However, Jay Patterson’s wife was diagnosed with a medical condition, which required major surgery
18 and Jay Patterson has not been able to work for the last two weeks and expects it will most likely be
19 another two weeks or so before he is able to return to work. Plaintiff’s counsel just became aware of this
20 issue a few days ago. Jay Patterson has indicated he needs at least thirty days to compile and complete
21 his report. Defendant Loan Care has agreed to an extension, provided the remaining discovery deadlines
22 are also continued. Plaintiff agrees that the remaining deadlines should be extended. Just to be safe, the
23 Parties jointly move to extend the remaining discovery deadlines for a period of approximately forty-five
24 (45) days as follows:

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Item	Current Date	New Date
Deadline to Amend Pleadings	July 20, 2020	No Change
Initial Expert Disclosures and Interim Status Report **	August 19, 2020	September 28, 2020
Rebuttal Expert Disclosures	September 18, 2020	October 28, 2020
Close of Discovery	August 19, 2020	December 07, 2020
Dispositive Motions	November 17, 2020	January 06, 2021
Pre-trial Order	December 17, 2020	February 05, 2021

6. Accordingly, the Parties respectfully request that the modified discovery schedule listed above be approved.

Dated August 13, 2020.

Submitted by:

/s/ Shawn W. Miller

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Agreed without Opposition:


/s/ Gary E. Schnitzer, Esq.

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AMENDED SCHEDULING ORDER

The above-set stipulation shall amend the May 14, 2020 Scheduling Order for this action.

IT IS SO ORDERED.



United States Magistrate Judge

Dated: August 14, 2020

****NOTE - The Local Rules as amended on 4/17/2020 eliminated former Local Rule 26-3's requirement for Interim Status Reports. Therefore, the parties are not required to submit an Interim Status Report. The parties are directed to review the revised local rules for further changes.****